

McGuireWoods LLP
1251 Avenue of the Americas
20th Floor
New York, NY 10020-1104
Phone: 212.548.2100
Fax: 212.548.2150
www.mcguirewoods.com

Philip A. Goldstein
Direct: 212.548.2167

McGUIREWOODS

pagoldstein@mcguirewoods.com
Fax: 212.715.6275

April 27, 2022

Via ECF

Honorable Ann Marie Donio, U.S.M.J.
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Court Room 3B
Camden, New Jersey 08101

Re: *Tiffanee Gould, et al. v. The Guida-Seibert Dairy Company, et al.*
Case No. 1:22-cv-01861-NLH-AMD

Dear Judge Donio:

This firm represents Defendant The Guida-Seibert Dairy Company (“Defendant”) in the above-referenced matter. Defendant respectfully requests an extension of time to answer, move, or otherwise respond to Plaintiff’s Complaint, making the new deadline **May 23, 2022**.

The current deadline for Defendant to respond to the Complaint is May 2, 2022. Counsel for Plaintiff consents to this request. There have been no previous requests for an extension of time to respond to the Complaint by Defendant. The requested extension does not affect any other scheduled dates or deadlines. Defendant is requesting the extension so that it can review Plaintiff’s allegations and investigate Plaintiff’s claims.

Attached for the Court’s review and consideration is a fully-executed stipulation extending Defendant’s time to respond to the Complaint. If this meets with the Court’s approval, Defendant respectfully requests that the Court endorse the Stipulation and arrange to file it with the Clerk of the Court.

Thank you for your consideration of this matter.

Respectfully Submitted,

/s/ Philip A. Goldstein

Philip A. Goldstein

PAG:cmg

Enclosure

cc: All Counsel of Record (via ECF)

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